

1 Scott Edward Cole, Esq. (S.B. #160744)
Laura Van Note Esq. (S.B. #310160)

2 **COLE & VAN NOTE**

555 12th Street, Suite 2100

3 Oakland, California 94607

Telephone: (510) 891-9800

4 Facsimile: (510) 891-7030

Email: sec@colevannote.com

5 Email: lvn@colevannote.com

6 Gary M. Klinger, Esq. (*pro hac vice*)

MILBERG COLEMAN BRYSON

PHILLIPS GROSSMAN, PLLC

227 W Monroe Street, Suite 2100

Chicago, Illinois 60606

8 Telephone: (866) 252-0878

Email: gklinger@milberg.com

9 Email: jnelson@milberg.com

10 *Plaintiffs' Interim Co-Lead Class Counsel*

11 *Additional Counsel Listed on the Signature Page*

12
13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA
15

16 JOHN PRUTSMAN, AMIRA MARTZ,
SIMCHA RINGEL, NAIOMI MARDEN,
17 ALANA BALAGOT, CORINNE
WARREN, SUNNY LAI, AND DAVID
18 KLEIN, INDIVIDUALLY AND ON
BEHALF OF ALL OTHERS SIMILARLY
19 SITUATED,

20 PLAINTIFFS,

21 VS.

22 NONSTOP ADMINISTRATION AND
INSURANCE SERVICES, INC.,
23 INCLUSIVE,

24 DEFENDANT.
25
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27
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CASE NO. 3:23-CV-01131-VC

**JOINT CASE MANAGEMENT
STATEMENT AND NOTICE OF
CLASSWIDE SETTLEMENT**

Date: July 3, 2024

Time: 10:00 a.m.

via Zoom Conference

Judge Hon. Rita F. Lin

Pursuant to the Court's order of January 24, 2024 Plaintiffs John Prutsman, Amira Martz, Simcha Ringel, Naiomi Marden, Alana Balagot, Sunny Lai, Corinne Warren, and David Klein (collectively, "Plaintiffs") and Defendant Nonstop Administration and Insurance Services, Inc. ("Defendant") jointly submit this case management statement and further notice the Court that, following mediation before the well-respected mediator Bennet G. Picker of Stradley Ronan, the Parties have reached a classwide settlement. Defendant is currently in active and ongoing discussions with counsel for Third-Party Defendant Conor Brian Fitzpatrick and is optimistic about the potential for complete resolution of these claims.

Accordingly, in light of the Parties' successful efforts to resolve the matter at mediation, the Parties respectfully request that the Court vacate all deadlines and stay further proceedings to allow the Parties to finalize the class settlement agreement and for Plaintiffs to prepare and file their motion for preliminary approval of class action settlement. As the classwide settlement will resolve all remaining issues in the litigation, the Parties respectfully request that the Court take the status conference set for July 3, 2024 off calendar and allow Plaintiffs forty five (45) days to file their motion for preliminary approval.

Dated: June 27, 2024

COLE & VAN NOTE

By: /s/ Scott Edward Cole
Scott Edward Cole, Esq.

Dated: June 27, 2024

**MILBERG COLEMAN BRYSON
PHILLIPS GROSSMAN, PLLC**

By: /s/ Gary M. Klinger
Gary M. Klinger, Esq. (*pro hac vice*)

Plaintiffs' Interim Co-Lead Class Counsel

Dated: June 27, 2024

CIPRIANI & WERNER PC

By: /s/ Jill H. Fertel
Jill H. Fertel, Esq.

Counsel for Defendant

ATTESTATION

I, Gary M. Klinger hereby attest, pursuant to N.D. Cal. Civil Local Rule 5-1(h)(3), that concurrence to the filing of this document has been obtained from each signatory.

By: /s/ Gary M. Klinger
Gary M. Klinger, Esq.